MEMO ENDORSEL

Law Offices of Joshua Parkhurst

11 Broadway, Suite 615 New York, NY 10004 (201) 577-2644 Of Counsel To: Giles Law Firm LLC

575 Fifth Avenue, 14th Floor

New York, NY 10017

June 2, 2022

USDC SDNY DOCUMENT

ELECTRONICALLY FILED

DOC#:

DATE FILED: 6/3/2022

Honorable Nelson S. Roman United States District Judge Southern District of New York 300 Quarrapos Street White Plains, NY 10601

Re: Bassi v. New York Medical College et al.

19 CV 7542 (NSR)

Dear Judge Roman:

We are the attorneys for plaintiff Harmeetinder Bassi, M.D. in the above-referenced action. We are writing to request permission to file a declaration with exhibits under seal in opposition to the defendants' motion for summary judgment.

The parties have served all documents with respect to their motions for summary judgment and are coordinating filing today. In addition to plaintiff's current submissions in opposition to the defendants' motions for summary judgment, the undersigned has prepared one declaration to submit four exhibits the parties agree should be maintained as confidential. These documents include academic records, records of investigations, or personnel records that each make reference to students or faculty other than the parties in this case. After consultation between the parties, we have agreed that these documents should be treated as confidential pursuant to the Confidentiality Agreement and Protective Order agreed to by the parties and So Ordered by the Court on March 8, 2021. The parties further agree that because other students and faculty have been referenced or are the subject matter of the documents in question, that these documents should be filed under seal.

The Court's considerations are appreciated.

Very truly yours,

Tachua Parkhuret

Plaintiff's request to file a declaration with exhibits under seal is GRANTED. Plaintiff's counsel may email an electronic copy of the documents to be sealed to chambers, noting the filing is under seal, and mail courtesy hard copies to the Court. The Clerk of Court is kindly directed to terminate the motion at ECF No. 133.

DATED: June 3, 2022 White Plains, NY

HON, NELSON S. ROMAN UNITED STATES DISTRICT JUDGE.